

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JACQUES ROY, ET AL.

CRIMINAL NO. 3:12-CR-54-L

GOVERNMENT'S WITNESS LIST

The United States Attorney for the Northern District of Texas, by and through the undersigned Assistant United States Attorney, files this, the Government's Witness List, in the above-captioned case.¹

LIKELY WITNESSES		
	Witness	Subject Matter of Testimony
Program Witnesses		
1	Mark Porter	Mr. Porter works for the Centers for Medicare and Medicaid Services (CMS) and is the person most responsible for home health care regulations for the region that encompasses Texas. Mr. Porter will testify about the programs known as Medicare and Medicaid, Parts A-D of Medicare, and regulations regarding Medicare home health care.
2	Lisa Garcia	Ms. Garcia is a registered nurse and an employee of Health Integrity, a contractor with Medicare, responsible for investigating fraud in the Medicare system. Ms. Garcia will testify about the legitimate process for the provision of Medicare Home Health Care.

¹ The government has identified the contact information and addresses for these witnesses in discovery productions and has not listed it in this public document. To the extent that the defense seeks that information again, the government will be happy to provide it.

Medistat Supervisors		
3	Teri Sivils	Ms. Sivils is a co-defendant and co-conspirator who has pled guilty. Ms. Sivils served as the office manager for Dr. Roy at Medistat and its predecessors and will testify about her communications with co-defendants, the manner in which Medistat operated, and her knowledge of the scheme to defraud.
4	James Aston	Mr. Aston is a former chief financial officer of Medistat and its predecessors. Mr. Aston will testify about his role at Medistat, communications with Dr. Roy, the creation of Apple of Eye Home Health Agency (“Apple”), and recordings he made of conversations with Dr. Roy.
5	Nicholas Lamarre	Mr. Lamarre is the son of Jacques Roy and the former chief financial officer of Medistat in 2012. Mr. Lamarre will testify about his work at Medistat, his communications with Dr. Roy, and the efforts by Medistat and Dr. Roy to hide billings through the use of Medicare HouseCalls, as alleged in Count 17 of the Superseding Indictment.
Medistat 485 Department		
6	Kendy Munoz (Valdez)	Ms. Munoz is a former employee at Medistat and served in the 485 Department, Pulmonary Department and as an Office Supervisor. Ms. Munoz will testify about her work at Medistat, her communications with the defendants, and relationships between Medistat and HHAs.
7	Beatrice Rios	Ms. Rios is a former employee at Medistat and served in the 485 Department and Durable Medical Equipment (DME) Department. Ms. Rios will testify about her work at Medistat, the history of the Medistat business, her communications with the defendants, and the changes at Medistat after June 2011.
8	Jessica Hernandez	Ms. Hernandez is a former employee of Medistat and was a supervisor within the 485 Department. Ms. Hernandez will testify about her work at Medistat, her communications with the defendants, and the changes at Medistat after June 2011.

9	Rachel Casillas	Ms. Casillas is a former employee of Medistat and served in the 485 Department. Ms. Casillas will testify about her work at Medistat, the 485 process, Medistat's relationships with other HHAs, her communications with the defendants, and changes at Medistat after June 2011.
10	Betty Callaway	Ms. Callaway is a former employee of Medistat and served in the 485 Department. Ms. Callaway will testify about her work at Medistat, the re-certification process, Medistat's relationships with HHAs, her communications with the defendants, and changes at Medistat after June 2011.
11	Betty Armstrong	Ms. Armstrong is a former employee of Medistat and served in the 485 Department and then in the New Patient Department. Ms. Armstrong will testify about her work at Medistat, Medistat's relationships with HHAs, the process for receiving new patients, and the changes at Medistat after June 2011.
Other Medistat Employees		
12	Juan "Augie" Galindo	Mr. Galindo is a Physician Assistant and a former employee of Medistat. Mr. Galindo will testify about his work at Medistat, his communications and disagreements with the defendants (Dr. Roy and Ms. Eleda primarily), the law enforcement search of Medistat, changes at Medistat after June 2011, and his visits with patients including those at homeless shelters.
13	Sarah Slatter	Ms. Slatter is a nurse practitioner and is a former employee of Medistat. Ms. Slatter will testify about her work at Medistat, her visits with Medistat patients, her communications with Dr. Roy, and changes at Medistat after June 2011.
14	Patricia Headley	Ms. Headley is a nurse practitioner and is a former employee of Medistat. Ms. Headley will testify about her work at Medistat, her visits with Medistat patients, her communications with Dr. Roy, and changes at Medistat after June 2011.

15	Heather Bowles	Ms. Bowles is a former employee of Medistat and served as a billing clerk, billing manager, and then later as a consultant. Ms. Bowles will testify about her work at Medistat, her communications with Dr. Roy, and billing performed by Medistat.
16	Porsche Bennett	Ms. Bennett is a former employee of Medistat and served as an extern, physical therapist, billing manager, and an assistant to nurse practitioners. Ms. Bennett will testify about her work at Medistat, the billing process utilized by the company, and the shift from Medistat to Medicare HouseCalls in 2011.
17	Tashawna Sorrells	Ms. Sorrells is a former employee of Medistat and served as an extern in the Referral Department, 485 Department, and in handling Care Plan Oversight (CPO) billing. Ms. Sorrells will testify about her work at Medistat, her communications with Dr. Roy, the process for billing for CPOs, and the changes at Medistat after June 2011.
18	Angela Owens	Ms. Owens is a former employee of Medistat and served as a marketer, in the 485 Department, as a therapist, and as a receptionist. Ms. Owens will testify about her work at Medistat, Medistat's relationships with HHAs, and her communications with the defendants, and the changes at Medistat after June 2011.
19	Christie Staves	Ms. Staves is a former employee of Medistat and served as a Referral Specialist and scheduler for Augie Galindo. Ms. Staves will testify about her work at Medistat, the process for handling referrals, her communications with the defendants, her observations of communications that Dr. Roy had with other employees, and the changes at Medistat after June 2011.
20	Jaime Esquer	Ms. Esquer is a former employee at Medistat and served as a therapy technician, pulmonary technician, and then in the Referral Department. Ms. Esquer will testify about her work at Medistat, the manner in which the Pulmonary Department functioned, and her communications with the defendants.

21	Sonny Mote	Mr. Mote is a former employee of Medistat and served as a Pulmonary Technician. Mr. Mote will testify about his work at Medistat, how pulmonary testing was performed by Medistat employees, and his communications with the defendants, his experiences at the Bridge and with Charry Home Health.
22	Michelle Corona	Ms. Corona (formerly Avila) is a former employee at Medistat and handled prescriptions for Medistat and then served in the pulmonary department. Ms. Corona will testify about her work at Medistat, the process for handling prescriptions ordered by Dr. Roy or other Medistat employees, her communications with Dr. Roy, and pulmonary testing.
23	Audrey Sanders	Ms. Sanders is a former employee of Medistat and served in the pharmacy department and as a scheduler for NP Sarah Slatter. Ms. Sanders will testify about her work at Medistat, the manner in prescriptions were ordered and filled at Medistat, scheduling patients, whether patients were homebound, her communications with Dr. Roy, and the changes at Medistat after June 2011.
24	Glenn Gann	Mr. Gann is a former employee of Medistat and served as the Information Technology manager. Mr. Gann will testify about his work at Medistat, the electronic file system at Medistat, how various employees could access the electronic system, the changes at Medistat after June 2011, the relationship between Medistat and Medicare HouseCalls, and his provision of electronic evidence to agents.
25	Christopher Todd	Mr. Todd is a former employee of Medistat and served in the file room and occasionally worked in the 485 Department. Mr. Todd will testify about his work at Medistat, the manner in which files were created, stored, and updated, the changes at Medistat after June 2011, and his communications with Dr. Roy.

26	Cybil Chatman	Ms. Chatman is a former employee of Medistat and served as an extern, file clerk, claim reviewer, new patient clerk, and as an assistant to a nurse practitioner. Ms. Chatman will testify about her role at Medistat, her communications with Dr. Roy, the frequency of new patient referrals, the process for new patients, and the changes at Medistat after June 2011.
Apple of Your Eye Employees		
27	Julie Dupon	Ms. Dupon (formerly Rottiers) is the former Director of Nursing for Apple. Ms. Dupon will testify about her communications with Cynthia Stiger and James Veasey, her work at Apple including her treatment of certain patients, and records she created or maintained at Apple.
28	Alesa Sterrett	Ms. Sterrett is a former employee of Apple and handled billing and administrative duties. Ms. Sterrett will testify about her work at Apple, its relationship with Dr. Roy, benefits that Apple provided to patients, and her communications with Ms. Stiger and Mr. Veasey.
29	Brittany Anderson	Ms. Anderson is a former employee of Apple and served as a receptionist. Ms. Anderson will testify about her duties at Apple, the manner in which Apple recruited patients, documentation sent back and forth between Apple and Medistat, and her communications with Ms. Stiger and Mr. Veasey.
30	Jennifer Elder	Ms. Elder is a former employee of Apple and served in a variety of roles, including as a marketer. Ms. Elder will testify about her work at Apple, extra benefits provided to Apple patients, audits of Apple, her communications with Ms. Stiger and Mr. Veasey, and specific instances of recruiting by Mr. Veasey and Ms. Stiger.
31	Donna Brown	Ms. Brown is a certified nurse assistant and is a former employee of Apple, having served in a marketing role. Ms. Brown will testify about her work at Apple, her communications with Ms. Stiger and Mr. Veasey, the recruiting performed by Apple, including specific instances of recruiting by Mr. Veasey, and her interactions with Dr. Roy.

32	Rebekah Keith	Ms. Keith is a registered nurse and previously worked for Apple in an auditing function. Ms. Keith will testify about her work at Apple, her review of Apple charts, and her communications with Ms. Stiger.
33	Marcie Crymes	Ms. Crymes is a registered nurse and is a former employee of Apple for a period of time in 2010, including having served in the role of Director of Nursing. Ms. Crymes will testify about her work at Apple, her communications with Ms. Stiger and Mr. Veasey, specific instances where she visited potential patients with Mr. Veasey, her observations at Apple with regards to the length patients remained under Medicare home health care, Apple's relationship with Dr. Roy, and her treatment and meeting with Cora and Charles Beck, as well as Daisy Turner.
Ultimate Care Home Health		
34	Cyprian Akamnonu	Mr. Akamnonu is a co-defendant and co-conspirator of the defendants. Mr. Akamnonu owned and operated Ultimate Home Health Care. Mr. Akamnonu will testify about the scheme to defraud, specific transactions between Apple and Ultimate, Apple's marketing practices, the value of Dr. Roy vs. other doctors, and his communications with the defendants.
35	Patricia Akamnonu	Ms. Akamnonu is a co-defendant and co-conspirator of the defendants. Ms. Akamnonu owned and operated Ultimate Home Health Care. Ms. Akamnonu will testify about the scheme to defraud, specific transactions between Apple and Ultimate, Apple's marketing practices, the value of Dr. Roy vs. other doctors, and her communications with the defendants.

Beneficiaries		
36	Daisy Turner	Ms. Turner is a Medicare beneficiary and is named in Count 2 of the Superseding Indictment. Ms. Turner will testify about the treatment she received and visits with Dr. Roy and other practitioners at Medistat. Ms. Turner will also testify about the treatment she received from practitioners at Apple.
37	Charles Beck	Mr. Beck is a Medicare beneficiary and is named in Count 3 of the Superseding Indictment. Mr. Beck will testify about the treatment he received and visits with Dr. Roy and other practitioners at Medistat. Mr. Beck will also testify about the treatment he received from practitioners at Apple.
38	Cora Beck	Ms. Beck is a Medicare beneficiary and is named in Count 4 of the Superseding Indictment. Ms. Beck will testify about the treatment she received and visits with Dr. Roy and other practitioners at Medistat. Ms. Beck will also testify about the treatment she received from practitioners at Apple, as well as her meeting with Mr. Veasey.
39	Loretta Shaw	Ms. Shaw is a Medicare beneficiary and is named in Count 5 of the Superseding Indictment. Ms. Shaw will testify about the treatment she received and visits with Dr. Roy and other practitioners at Medistat. Ms. Shaw will also testify about the treatment she received from practitioners at Ultimate.
40	Barbara Lynch	Ms. Lynch is a Medicare beneficiary and is named in Count 6 of the Superseding Indictment. Ms. Lynch will testify about the treatment she received and visits with Dr. Roy and other practitioners at Medistat. Ms. Lynch will also testify about the treatment she received from practitioners at Ultimate.
41	Vivian Owens	Ms. Owens is a Medicare beneficiary and is named in Count 7 of the Superseding Indictment. Ms. Owens will testify about the treatment she received and visits with Dr. Roy and other practitioners at Medistat. Ms. Owens will also testify about the treatment she received from practitioners at Ultimate.

42	Paul White	Mr. White is a Medicare beneficiary and is named in Count 8 of the Superseding Indictment. Mr. White will testify about the treatment he received and visits with Dr. Roy and other practitioners at Medistat. Mr. White will also testify about the treatment he received from practitioners at Charry.
43	Stanley Clovis	Mr. Clovis is a Medicare beneficiary and is named in Count 9 of the Superseding Indictment. Mr. Clovis will testify about the treatment he received and visits with Dr. Roy and other practitioners at Medistat. Mr. Clovis will also testify about the treatment he received from practitioners at Charry.
44	Rachel Sanchez	Ms. Sanchez is a Medicare beneficiary and is named in Count 10 of the Superseding Indictment. Ms. Sanchez will testify about the treatment she received and visits with Dr. Roy and other practitioners at Medistat. Ms. Sanchez will also testify about the treatment she received from practitioners at Charry.
45	Kenneth Farr	Mr. Farr is a Medicare beneficiary and is named in Count 11 of the Superseding Indictment. Mr. Farr will testify about the treatment he received and visits with Dr. Roy and other practitioners at Medistat. Mr. Farr will also testify about the treatment he received from practitioners at Charry.
46	Billie Stevenson	Ms. Stevenson is a Medicare beneficiary and is named in Count 15 of the Superseding Indictment. Ms. Stevenson will testify about the treatment she received and visits with Dr. Roy and other practitioners at Medistat. Ms. Turner will also testify about the treatment she received from practitioners at Apple.
47	Corine Williams	Ms. Williams is a Medicare beneficiary and is named in Count 16 of the Superseding Indictment. Ms. Williams will testify about the treatment she received and visits with Dr. Roy and other practitioners at Medistat. Ms. Williams will also testify about the treatment she received from practitioners at Apple.

Primary Care Physicians or Treating Physicians		
48	Dr. Sunti Srivathanakul	Dr. Srivathanakul is a general practitioner and was the primary care physician for Daisy Turner (Count 2). Dr. Srivathanakul will testify about Ms. Turner's medical condition during the relevant time frame and whether she qualified for Medicare Home Health Care. He will also testify about his communications with Dr. Roy.
49	Dr. Nasrin Safari	Dr. Safari is an internist/general practitioner and was a primary care physician for Charles Beck (Count 3). Dr. Safari will testify about Mr. Beck's medical condition during the relevant time frame and whether he qualified for Medicare Home Health Care.
50	Dr. Muhammad Nasir	Dr. Nasir is a general practitioner and was the primary care physician for Cora Beck (Count 4). Dr. Nasir will testify about Ms. Beck's medical condition during the relevant time frame and whether she qualified for Medicare Home Health Care.
51	Dr. Robert A. Goldsteen	Dr. Goldsteen is an internist/general practitioner and was the primary care physician for Loretta Shaw (Count 5). Dr. Goldsteen will testify about Ms. Shaw's medical condition during the relevant time frame and whether she qualified for Medicare Home Health Care.
52	Dr. Michael Aragon	Dr. Aragon is a nephrologist and was a primary care physician for Barbara Lynch (Count 6). Dr. Aragon will testify about Ms. Lynch's medical condition during the relevant time frame and whether she qualified for Medicare Home Health Care.
53	Dr. Michael Muncy	Dr. Muncy is an orthopedist and was a treating physician for Vivian Owens (Count 7). Dr. Muncy will testify about Ms. Owens' medical condition during the relevant time frame and whether she qualified for Medicare Home Health Care.

54	Dr. Cornelia Tan	Dr. Tan specializes in Internal Medicine and was a resident at Methodist. Dr. Tan treated Paul White, Rachel Sanchez, and Kenneth Farr (Counts 8, 10, and 11). Dr. Tan will testify about the medical condition of each of these patients during the relevant time frame and whether they qualified for Medicare Home Health Care, as well as her work at The Bridge.
55	Dr. Minhaj Khan	Dr. Khan was a doctor working with the Community Outpatient Primary Care Program, starting in 2010 and treated Stanley Clovis and Kenneth Farr (Counts 9 and 11). Dr. Khan will testify about his work at The Bridge, Mr. Clovis's and Mr. Farr's medical conditions during the relevant time frame and whether they qualified for Medicare Home Health Care.
Witnesses related to The Bridge and/or Charry Home Health		
56	Gary McClung	Mr. McClung is the former safety manager at The Bridge, a facility for the homeless in Dallas, Texas. Mr. McClung will testify about the purpose of The Bridge, safety procedures at The Bridge, its relationship with other facilities serving the homeless, medical care at The Bridge, and his knowledge, observations, and interactions with Charity Eleda recruiting and treating individuals at The Bridge.
57	Jamal Webb	Mr. Webb is a former employee at The Bridge and served on the security staff. Mr. Webb will testify about the purpose of The Bridge, safety procedures at The Bridge, its relationship with other facilities serving the homeless, medical care at The Bridge, and his knowledge, observations, and interactions with Charity Eleda recruiting and treating individuals at The Bridge.
58	Hayedeh Jahansouz	Ms. Jahansouz is a manager at The Bridge. Ms. Jahansouz will testify about the purposes of The Bridge, medical care at The Bridge, procedures and protocols at The Bridge, the identification of certain individuals who stayed at The Bridge, and a description of paperwork and records related to those individuals.

59	Officer BC Wetton	Officer Wetton is a former (now retired) officer with the Dallas Police Department. Officer Whetton will testify about his work near The Bridge, and his interactions with Charity Eleda.
60	Detective Julie Cassidy	Detective Cassidy is a detective with the Dallas Police Department. Detective Cassidy will testify about her interactions with and interview of Charity Eleda.
61	Kenneth Poe	Mr. Poe is a former resident of The Bridge. Mr. Poe will testify about his interactions and communications with Charity Eleda, his recruitment of patients for Ms. Eleda, and payments made by Ms. Eleda to Mr. Poe.
62	Donatus Benson	Mr. Benson is a licensed vocational nurse and former employee of Charry Home Health. Mr. Benson will testify about his work at Charry, his interactions with Charity Eleda, and his visits to The Bridge.
Miscellaneous		
63	Ernest Amadi	Mr. Amadi owned and managed a home health company, Alliance Healthcare Services, L.P., during a portion of the conspiracy and was charged, convicted, and sentenced for his role in a health care fraud scheme. Mr. Amadi will testify about his meeting with Dr. Roy in October 2010, his communications with Dr. Roy, and Dr. Roy's frisking of Mr. Amadi during the October 2010 meeting.
64	Ferguson Ikhile	Mr. Ikhile was a registered nurse and owner and operator of PTM Healthcare Services Inc. Mr. Ikhile will testify about his communications with Dr. Roy, Dr. Roy's relationship with PTM, and the interactions between PTM and Medistat.
65	Melissa Parks	Ms. Parks is forensic accountant that was hired by the government for purposes of examining data associated with the scheme to defraud. Ms. Parks will testify about this data and her analysis thereof, including the total amounts billed by and paid to the defendants, the number of patients associated with the relevant entities, and the flow of money related to the scheme to defraud.

66	Scott Ward	Mr. Ward is a Project Director for Health Integrity, who is contracted by Medicare to investigate fraud. Mr. Ward will testify about the suspension of Medistat, Dr. Roy, and others by Medistat, the CMS investigation of Medistat and Dr. Roy's and Dr. Roy's obstruction of that investigation.
67	Ed Koranda	Ed Koranda is a Special Agent with the Department of Homeland Security and will testify about Charity Eleda's and Jacques Roy's travel records.
68	Terry Braswell	Ms. Braswell is the former nanny for Dr. Roy's children and she will testify regarding her communications with Dr. Roy regarding his request to have her open a company nominally in her name but which would be controlled by Dr. Roy.
69	Muhammed Usman	Mr. Usman owned Royal Ambulance and First Choice EMS. Mr. Usman will testify about his communications with Dr. Roy, in particular, those conversations regarding paying Dr. Roy to sign certain forms.
70	Beverly Sanders	Ms. Sanders is a former patient and former mistress of Dr. Roy. She will testify about her interaction and communications with Dr. Roy, including his comments regarding the FBI, the investigation into his activities, and his desire to flee.
71	V. William Messer	V. William Messer is a Special Agent with the FBI. Special Agent Messer interviewed James Veasey following his arrest and will testify about the statements made by Mr. Veasey.
Case Agents		
72	Miranda Bennett	Miranda Bennett is a Special Agent with HHS-OIG and is one of the case agents. Special Agent Bennett will testify about the investigation and certain evidence that was recovered. The government may seek to qualify Special Agent Bennett as a summary witness.
73	Chelsie Drews	Chelsie Drews is a Special Agent with the FBI and is one of the case agents. Special Agent Drews will testify about the investigation, statements made by the defendants, and evidence recovered during the investigation.

Search Warrant Custodians²		
74	Patrick Bronaugh	Patrick Bronaugh is a Special Agent with HHS-OIG. Special Agent Bronaugh acted as the custodian for the search warrant executed at Medistat and will testify, if necessary, to the authenticity of items seized during that search.
75	Jesse Hartman	Mr. Hartman is a forensic computer examiner for the HHS-OIG. Mr. Hartman collected electronics seized from Medistat, Dr. Roy's house, Apple of Your Eye, and Ultimate and will testify, if necessary, to the authenticity of electronic evidence seized during that search.
76	Brian Huber	Mr. Huber is a Litigation Support Manager for the Department of Justice. In his role as Litigation Support Manager, Mr. Huber maintains electronic evidence on the DOJ's searchable Relativity database. Mr. Huber will testify as to how items were stored in and produced from this database.
77	James Michael Stapleton	James Stapleton is a Special Agent with HHS-OIG. Special Agent Stapleton acted as the custodian for the search warrant executed at Medistat's storage unit and will testify, if necessary, to the authenticity of items seized during that search.
78	Tim DeFrancesca	Tim DeFrancesca is a Special Agent with HHS-OIG. Special Agent DeFrancesca acted as the custodian for the search warrant executed at Dr. Roy's house and will testify, if necessary, to the authenticity of items seized during that search and where they were found.

² On February 11, and 12, 2016, the government met with defense counsel regarding proposed stipulations. At these meeting, the government provided advance review of all of the government exhibits that the government intended to use. These meetings focused the government's request that the defense stipulate to the authenticity of a large percentage of the government exhibits. Counsel for Defendants Stiger and Veasey agreed to stipulate to the authenticity of the exhibits at issue. Defendant Roy agreed to certain other exhibits. Defendant Eleda would not agree to stipulate to the authenticity of any exhibits but for certain bank records. As a result of the failure to stipulate, the government has added 39 search warrant custodians and records custodians to its witness list.

79	Erin Whittington	Erin Whittington is a Special Agent with HHS-OIG. Special Agent Whittington seized specific items from Dr. Roy's house, including signature samples and contracts, and will testify, if necessary, to the authenticity of those seized items and where they were found.
80	Matthew Kirk	Matthew Kirk is a Special Agent with HHS-OIG. Special Agent Kirk seized specific items from Dr. Roy's house, including contracts, and will testify, if necessary, to the authenticity of those seized items and where they were found.
81	Charles Bond	Charles Bond is an investigator with the Medicaid Fraud Control Unit (MFCU). Investigator Bond seized specific items from Dr. Roy's house, including books, paperwork, and a folder of false identity information, and will testify, if necessary, to the authenticity of those seized items and where they were found.
82	Andre Bires	Andre Bires is a former Special Agent with the FBI. While a Special Agent, Mr. Bires acted as the custodian for the search warrant executed at Charry Home Care Services, Inc., and will testify, if necessary, to the authenticity of items seized during that search.
83	Jack Geren	Jack Geren is a Special Agent with HHS-OIG. Special Agent Geren was the case agent handling the investigation into DePromise Home Health and will testify, if necessary, to documents obtained during that investigation.
84	Chris Ranney	Chris Ranney is a Special Agent with the FBI. Special Agent Ranney acted as the custodian for the search warrant executed at Charity Eleda's residence and will testify, if necessary, to the authenticity of items seized during that search.
85	Tiffany Smith	Tiffany Smith is a Special Agent with HHS-OIG. Special Agent Smith acted as the custodian for the search warrant executed at Apple of Your Eye's storage unit and will testify, if necessary, to the authenticity of items seized during that search.

86	Dan McQueen	Dan McQueen is a Special Agent with HHS-OIG. Special Agent McQueen acted as the custodian for the search warrant executed at Ultimate Home Health and will testify, if necessary, to the authenticity of items seized during that search.
87	Robby Godeaux	Mr. Godeaux is a Forensic Computer Examiner and was responsible for transferring the contents of certain phones.
88	Jorge Ramirez-Mera	Mr. Ramirez-Mera is a Forensic Computer Examiner and was responsible for transferring the contents of certain phones.
Records Custodians		
89	Records Custodian, Bank of America	If necessary, the Records Custodian from Bank of America will testify to the authenticity of all Bank of America financial accounts, found at Exhibits 405-407, 410, 414-437 and 440-444.
90	Records Custodian, JP Morgan Chase/Washington Mutual	If necessary, the Records Custodian from JP Morgan Chase Bank will testify to the authenticity of all JP Morgan Chase financial accounts and those accounts previously maintained by Washington Mutual, found at Exhibits 411-413, 424-425, 432, and 438.
91	Records Custodian, Capital One N.A.	If necessary, the Records Custodian from Capital One, N.A. will testify to the authenticity of all Capital One financial accounts, found at Exhibit 408.
92	Records Custodian, BBVA Compass Bank	If necessary, the Records Custodian from Compass Bank will testify to the authenticity of all Compass Bank financial accounts, found at Exhibits 439 and 445-446.
93	Records Custodian, Lufthansa German Airlines	If necessary, the Records Custodian from Lufthansa German Airlines will testify as to the authenticity of its flight records, found at Exhibit 83.
94	Records Custodian, U.S. Customs and Border Protection	If necessary, the Records Custodian from U.S. Border and Customs Protection will testify as to the authenticity of its travel records, found at Exhibit 84.

95	Records Custodian, Parkland Hospital	If necessary, the Records Custodian from Parkland Hospital will testify as to the authenticity of its medical records, found at Exhibits 137, 150, 164, 171, 183, 194, and 197.
96	Records Custodian, Dallas Area Rapid Transit	If necessary, the Records Custodian from Dallas Area Rapid Transit will testify as to the authenticity of its records, found at Exhibits 138, 151, 167 and 179.
97	Records Custodian, DaVita Grapevine Dialysis	If necessary, the Records Custodian from DaVita Grapevine Dialysis will testify as to the authenticity of its records, found at Exhibit 155.
98	Records Custodian, Elite Orthopedics	If necessary, the Records Custodian from Elite Orthopedics will testify as to the authenticity of its records, found at Exhibit 159.
99	Records Custodian, Texas Workforce Commission	If necessary, the Records Custodian from the Texas Workforce Commission will testify as to the authenticity of its records, found at Exhibit 160.
100	Records Custodian, Timberlawn Mental Health System	If necessary, the Records Custodian from the Timberlawn Mental Health System will testify as to the authenticity of its records, found at Exhibit 165.
101	Records Custodian, Dallas County Sheriff's Department	If necessary, the Records Custodian from the Dallas County Sheriff's Department will testify as to the authenticity of jail records found at Exhibit 173.
102	Records Custodian, Management Services International	If necessary, the Records Custodian from Management Services International will testify as to the authenticity of investment documents found at Exhibits 213-214.
103	Records Custodian, Allianz Life Insurance	If necessary, the Records Custodian from Allianz Life Insurance Company will testify as to the authenticity of annuity documents found at Exhibit 215.
104	Records Custodian, American Equity Investment	If necessary, the Records Custodian from American Equity Investments will testify as to the authenticity of annuity documents found at Exhibit 216.

105	Records Custodian, SEI Private Trust	If necessary, the Records Custodian from SEI Private Trust Company will testify as to the authenticity of annuity documents found at Exhibit 217.
106	Records Custodian, National Life Insurance	If necessary, the Records Custodian from National Life Insurance Company will testify as to the authenticity of annuity documents found at Exhibit 218.
107	Records Custodian, PacificLife Insurance	If necessary, the Records Custodian from Pacific Life Insurance Company will testify as to the authenticity of annuity documents found at Exhibit 218.
108	Records Custodian, Elite Video Productions	If necessary, the Records Custodian from Elite Video Productions will testify as to the authenticity of the video deposition found at Exhibit 288.
109	Records Custodian, KDFW Fox 4	If necessary, the Records Custodian from KDFW Fox 4 will testify as to the authenticity of video footage found at Exhibits 289 and 291.
110	Records Custodian, Texas Medical Board	If necessary, the Records Custodian from the Texas Medical Board will testify as to the authenticity of the documents contained in Exhibit 312.
111	Records Custodian, Texas Secretary of State	If necessary, the Records Custodian from the Office of the Secretary of the State of Texas will testify as to the authenticity of the corporate documents found at Exhibits 208-212.
112	Records Custodian, Center for Medicare and Medicaid Services	If necessary, the Records Custodian from the Center for Medicare and Medicaid Services will testify as to the authenticity of the Medicare program-related documents found at Exhibits 316-318, 320, 322, 325-327, 330-332, 335-337, 340-342 and 371-397.
113	Records Custodian, Zone Program Integrity Contractor – Zone 4	If necessary, the Records Custodian from the Zone Program Integrity Contractor – Zone 4 will testify as to the authenticity of the claims data and suspension documents found at Exhibits 297-306, 319, 321, 323, 328, 333, 338, 343 and 345-356.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

/s/ P.J. Meitl
P.J. MEITL
Assistant United States Attorney
D.C. Bar No. 502391
Virginia Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8680
Facsimile: 214.659.8809
Email: philip.meitl@usdoj.gov

/s/ Nicole Dana
NICOLE DANA
Special Assistant United States Attorney
Texas State Bar No. 24062268
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8694
Facsimile: 214.659.8805
Email: nicole.dana@usdoj.gov

/s/ Chad E. Meacham
CHAD E. MEACHAM
Criminal Chief
Texas State Bar No. 00784584
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8716
Facsimile: 214.767.4100
Email: chad.meacham@usdoj.gov

CERTIFICATE OF SERVICE

On February 15, 2016, I electronically submitted the following document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Criminal Procedure 49(b).

/s/ Nicole Dana

Nicole Dana

Special Assistant United States Attorney